

July 5, 2012

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk Rhode Island Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888

> RE: Docket 4323 - Application for Approval of a Change in Electric and Gas Base Distribution Rates Pursuant to R.I.G.L. Sections 39-3-10 and 39-3-11 Responses to Division Data Requests - Set 7 - ELEC/GAS

Dear Ms. Massaro:

Enclosed is an original and ten (10) copies of National Grid's¹ responses to the Division's Seventh Set of Data Requests in the above-captioned proceeding.

The enclosed responses complete the Seventh Set, as indicated on the enclosed discovery log.

Thank you for your attention to this transmittal. If you have any questions, please feel free to contact me at (781) 907-2153.

Very truly yours,

Celia B. O'Brien

Celia B. O'Brien

Enclosures

cc: Docket 4323 Service List Leo Wold, Esq. Steve Scialabba, Division

¹ The Narragansett Electric Company d/b/a National Grid (herein referred to as "National Grid" or the "Company").

Certificate of Service

| I hereby certify th | at a copy of the | cover letter ar | nd/or any ma | aterials acco | ompanying th | is certificate |
|---------------------|------------------|-----------------|--------------|---------------|-----------------|----------------|
| were electronicall | y submitted, har | nd delivered a | nd mailed to | the individ | luals listed be | low. |

| <u>/S/</u> | July 5, 2012 |
|-------------|--------------|
| Janea Dunne | Date |

National Grid (NGrid) – Request for Change in Electric & Gas Distribution Rates Docket No. 4323 – Service List updated on 6/22/12

| Name/Address | E-mail Distribution | Phone |
|--|-----------------------------------|--------------|
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| Providence, RI 02907 | | |
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| National Grid | Jennifer.hutchinson@us.ngrid.com | |
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| Ellen M. Evans, Sr. Trial Atty. | ellen.evans@navy.mil | 202-685-2235 |
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| Litigation Office | | |
| 720 Kennon St., Bldg. 36, Room 233 | | |
| Washington Navy Yard, DC 20374-5051 | | |
| Dr. Kay Davoodi, P.E. | Khojasteh.davoodi@navy.mil | 202-685-3319 |
| Utility Rates and Studies Office | | |
| NAVFACHQ- Building 33 | | |
| 1322 Patterson Ave SE | Larry.r.allen@navy.mil | |
| Washington Navy Yard, D.C. 20374-5065 | | |
| Robert J. McConnell, Esq. (Wiley Ctr.) | bmcconnell@motleyrice.com | 401-457-7700 |
| Motley Rice LLC | | |

| 321 South Main St. – 2 nd Floor | jhowat@nclc.org | |
|--|---------------------------------|--------------|
| Providence, RI 02903 | <u></u> | |
| Maurice Brubaker | mbrubaker@consultbai.com | 401-724-3600 |
| Brubaker and Associates, Inc. | | |
| PO Box 412000 | | |
| St.Louis, MO 63141-2000 | | |
| Ali Al-Jabir | aaljabir@consultbai.com | |
| Brubaker and Associates, Inc. | | |
| David Effron | Djeffron@aol.com | 603-964-6526 |
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| North Hampton, NH 03862-2243 | | |
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| Revilo Hill Associates | | |
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| Lee Smith | | |
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| Suite 300 | | |
| Columbia, Maryland 21044 | | |
| Bruce Gay | bruce@monticelloconsulting.com | |
| Monticello Consulting | <u> </u> | |
| 4209 Buck Creek Court | | |
| North Charleston, SC 29420 | | |
| Matthew Kahal | mkahal@exeterassociates.com | |
| c/o Exeter Associates | | |
| 10480 Little Patuxent Parkway | | |
| Suite 300 | | |
| Columbia, MD 21044 | | |
| File original & 11 copies w/: | Lmassaro@puc.state.ri.us | 401-780-2107 |
| Luly E. Massaro, Commission Clerk | Anault@puc.state.ri.us | 1 |
| Public Utilities Commission | Adalessandro@puc.state.ri.us | 1 |
| 89 Jefferson Blvd. | • | 4 |
| Warwick, RI 02888 | Nucci@puc.state.ri.us | 4 |
| | Dshah@puc.state.ri.us | - |
| | Sccamara@puc.state.ri.us | |

| DATA SET | DATA REQUEST | DATE ISSUED | DATE FILED | WITNESS | ATTACHMENT | CONFIDENTIAL ATTACHMENT | | | | |
|----------------|------------------------|----------------|------------|---------------------|--------------------|----------------------------|--|--|--|--|
| | DIVISION SET 1 | | | | | | | | | |
| Division Set 1 | Division 1-1- ELEC | 5/9/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 1-1-ELEC | | | | | |
| Division Set 1 | Division 1-2- ELEC | 5/9/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 1-2-ELEC | | | | | |
| Division Set 1 | Division 1-3- ELEC | 5/9/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 1-3-ELEC | | | | | |
| Division Set 1 | Division 1-4- ELEC | 5/9/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 1-4-ELEC | | | | | |
| Division Set 1 | Division 1-5- ELEC | 5/9/2012 | 5/25/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-6- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | Att. DIV 1-6-ELEC | | | | | |
| Division Set 1 | Division 1-7- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-8- ELEC | 5/9/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 1-8-ELEC | | | | | |
| Division Set 1 | Division 1-9- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | Att. DIV 1-9-ELEC | | | | | |
| Division Set 1 | Division 1-10- ELEC | 5/9/2012 | 5/25/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-11- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | Att. DIV 1-11-ELEC | | | | | |
| Division Set 1 | Division 1-12- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-13- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | Att. DIV 1-13-ELEC | | | | | |
| Division Set 1 | Division 1-14- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-15- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-16- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-17- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-18- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-19- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-20- ELEC | 5/9/2012 | 5/25/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-21- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | Att. DIV 1-21-ELEC | | | | | |
| Division Set 1 | Division 1-22- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-23- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | Att. DIV 1-23-ELEC | | | | | |
| Division Set 1 | Division 1-24- ELEC | 5/9/2012 | 5/25/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-25- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-26- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |
| Division Set 1 | Division 1-27- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | Att. DIV 1-27-ELEC | | | | | |
| Division Set 1 | Division 1-28- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | |

| DATA SET | DATA REQUEST | DATE ISSUED | DATE FILED | WITNESS | ATTACHMENT | CONFIDENTIAL ATTACHMENT | | | | | |
|----------------|------------------------|----------------|------------|---------------------|---|----------------------------|--|--|--|--|--|
| Division Set 1 | Division 1-29- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | Att. DIV 1-29-ELEC | | | | | | |
| Division Set 1 | Division 1-30- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 1 | Division 1-31- ELEC | 5/9/2012 | 5/23/2012 | Michael D. Laflamme | | | | | | | |
| | DIVISION SET 2 | | | | | | | | | | |
| Division Set 2 | Division 2-1- GAS | 5/14/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 2-1-GAS | | | | | | |
| Division Set 2 | Division 2-2- GAS | 5/14/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 2-2-GAS | | | | | | |
| Division Set 2 | Division 2-3- GAS | 5/14/2012 | 5/25/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-4- GAS | 5/14/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 2-4-GAS | | | | | | |
| Division Set 2 | Division 2-5- GAS | 5/14/2012 | 5/25/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-6- GAS | 5/14/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 2-6-GAS | | | | | | |
| Division Set 2 | Division 2-7- GAS | 5/14/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 2-7-GAS | | | | | | |
| Division Set 2 | Division 2-8- GAS | 5/14/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 2-8-GAS | | | | | | |
| Division Set 2 | Division 2-9- GAS | 5/14/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 2-9-GAS | | | | | | |
| Division Set 2 | Division 2-10- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-11- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-12- GAS | 5/14/2012 | 5/25/2012 | Michael D. Laflamme | Att. DIV 2-12-GAS | | | | | | |
| Division Set 2 | Division 2-13- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-14- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-15- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-16- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | Att. DIV 2-16-1-GAS Att. DIV 2-16-2-GAS Att. DIV 2-16-3-GAS | | | | | | |
| Division Set 2 | Division 2-17- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-18- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-19- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-20- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-21- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | Att. DIV 2-21-GAS | | | | | | |
| Division Set 2 | Division 2-22- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | Att. DIV 2-22-GAS | | | | | | |
| Division Set 2 | Division 2-23- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | Att. DIV 2-23-GAS | | | | | | |
| Division Set 2 | Division 2-24- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 2 | Division 2-25- GAS | 5/14/2012 | 5/29/2012 | Michael D. Laflamme | | | | | | | |

| DATA SET | DATA REQUEST | DATE ISSUED | DATE FILED | WITNESS | ATTACHMENT | CONFIDENTIAL ATTACHMENT | | | |
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| DIVISION SET 3 | | | | | | | | | |
| Division Set 3 | Division 3-1- ELEC/GAS | 5/30/2012 | 6/11/2012 | Michael D. Laflamme | Att. DIV 3-1-ELEC/GAS | | | | |
| Division Set 3 | Division 3-2- ELEC/GAS | 5/30/2012 | 6/13/2012 | Michael D. Laflamme | Att. DIV 3-2-ELEC/GAS | | | | |
| Division Set 3 | Division 3-3- ELEC/GAS | 5/30/2012 | 6/12/2012 | Robert B. Hevert | Att. DIV 3-3-ELEC/GAS | | | | |
| Division Set 3 | Division 3-4- ELEC/GAS | 5/30/2012 | 6/12/2012 | Robert B. Hevert | | | | | |
| Division Set 3 | Division 3-5- ELEC/GAS | 5/30/2012 | 6/12/2012 | Robert B. Hevert | Att. DIV 3-5-ELEC/GAS | | | | |
| Division Set 3 | Division 3-6- ELEC/GAS | 5/30/2012 | 6/13/2012 | Michael D. Laflamme | Att. DIV 3-6-ELEC/GAS (Redacted) | Att. DIV 3-6-ELEC/GAS (Confidential) | | | |
| Division Set 3 | Division 3-7- ELEC/GAS | 5/30/2012 | 6/11/2012 | Michael D. Laflamme | Att. DIV 3-7-1-ELEC/GAS Att. DIV 3-7-2-ELEC/GAS Att. DIV 3-7-3-ELEC/GAS | | | | |
| Division Set 3 | Division 3-8- ELEC/GAS | 5/30/2012 | 6/12/2012 | Legal Department and Robert B. Hevert | | | | | |
| Division Set 3 | Division 3-9- ELEC/GAS | 5/30/2012 | 6/11/2012 | Mustally Hussain | Att. DIV 3-9-1-ELEC/GAS Att. DIV 3-9-2-ELEC/GAS Att. DIV 3-9-3-ELEC/GAS Att. DIV 3-9-4-ELEC/GAS Att. DIV 3-9-5-ELEC/GAS Att. DIV 3-9-6-ELEC/GAS Att. DIV 3-9-7-ELEC/GAS Att. DIV 3-9-8-ELEC/GAS Att. DIV 3-9-8-ELEC/GAS Att. DIV 3-9-9-ELEC/GAS | | | | |
| Division Set 3 | Division 3-10- ELEC/GAS | 5/30/2012 | 6/11/2012 | Mustally Husain | Att. DIV 3-10-ELEC/GAS | | | | |
| Division Set 3 | Division 3-11- ELEC/GAS | 5/30/2012 | 6/11/2012 | Michael D. Laflamme | Att. DIV 3-11-ELEC/GAS | | | | |
| Division Set 3 | Division 3-12- ELEC/GAS | 5/30/2012 | 6/11/2012 | Michael D. Laflamme | | | | | |
| Division Set 3 | Division 3-13- ELEC/GAS | 5/30/2012 | 6/11/2012 | Michael D. Laflamme | | | | | |
| Division Set 3 | Division 3-14- ELEC/GAS | 5/30/2012 | 6/13/2012 | Michael D. Laflamme | | | | | |
| Division Set 3 | Division 3-15- ELEC/GAS | 5/30/2012 | 6/11/2012 | Michael D. Laflamme | | | | | |
| Division Set 3 | Division 3-16- ELEC/GAS | 5/30/2012 | 6/11/2012 | Michael D. Laflamme | | | | | |
| Division Set 3 | Division 3-17- ELEC/GAS | 5/30/2012 | 6/11/2012 | Michael D. Laflamme | Att. DIV 3-17-ELEC/GAS | | | | |
| Division Set 3 | Division 3-18- ELEC/GAS | 5/30/2012 | 6/12/2012 | Robert B. Hevert | | | | | |
| Division Set 3 | Division 3-19- ELEC | 5/30/2012 | 6/12/2012 | Robert B. Hevert | | | | | |
| Division Set 3 | Division 3-20- ELEC/GAS | 5/30/2012 | 6/12/2012 | Robert B. Hevert | | | | | |
| Division Set 3 | Division 3-21- ELEC/GAS | 5/30/2012 | 6/12/2012 | Robert B. Hevert | | | | | |
| Division Set 3 | Division 3-22- ELEC/GAS | 5/30/2012 | 6/12/2012 | Robert B. Hevert | Att. DIV 3-22-ELEC/GAS | | | | |
| Division Set 3 | Division 3-23- ELEC/GAS | 5/30/2012 | 6/12/2012 | Robert B. Hevert | Att. DIV 3-23-ELEC/GAS | | | | |

| DATA SET | DATA | DATE | DATE FILED | WITNESS | ATTACHMENT | CONFIDENTIAL |
|----------------|--------------------------------------|-----------|------------|--------------------------------------|--|--------------|
| DATASEI | REQUEST | ISSUED | DATE FILED | WIINESS | ATTACHWENT | ATTACHMENT |
| Division Set 3 | Division 3-24- ELEC/GAS | 5/30/2012 | 6/13/2012 | Robert B. Hevert | Att. DIV 3-24-ELEC/GAS | |
| Division Set 3 | Division 3-25- ELEC/GAS | 5/30/2012 | 6/12/2012 | Robert B. Hevert | Att. DIV 3-25-ELEC/GAS | |
| Division Set 3 | Division 3-26- ELEC/GAS | 5/30/2012 | 6/12/2012 | Robert B. Hevert | | |
| Division Set 3 | Division 3-27- ELEC/GAS | 5/30/2012 | 6/12/2012 | Robert B. Hevert | | |
| | | | DIVIS | ION SET 4 | | |
| Division Set 4 | Division 4-1- GAS | 6/7/2012 | | Paul M. Normand | | |
| Division Set 4 | Division 4-2- GAS | 6/7/2012 | 6/19/2012 | Paul M. Normand | | |
| Division Set 4 | Division 4-3- GAS | 6/7/2012 | 6/20/2012 | Ann E. Leary | | |
| Division Set 4 | Division 4-4- GAS | 6/7/2012 | 6/19/2012 | Paul M. Normand | | |
| Division Set 4 | Division 4-5- GAS | 6/7/2012 | 6/19/2012 | Paul M. Normand | | |
| Division Set 4 | Division 4-6- GAS | 6/7/2012 | 6/20/2012 | Ann E. Leary | | |
| Division Set 4 | Division 4-7- GAS | 6/7/2012 | 6/20/2012 | Ann E. Leary | | |
| Division Set 4 | Division 4-8- GAS | 6/7/2012 | 6/19/2012 | Ann E. Leary | Att. DIV 4-8-1-GAS Att. DIV 4-8-2-GAS Att. DIV 4-8-3-GAS Att. DIV 4-8-4-GAS Att. DIV 4-8-5-GAS | |
| Division Set 4 | Division 4-9- GAS | 6/7/2012 | 6/20/2012 | Ann E. Leary | | |
| Division Set 4 | Division 4-10- GAS | 6/7/2012 | 6/19/2012 | Ann E. Leary | Att. DIV 4-10-GAS | |
| Division Set 4 | Division 4-11- GAS | 6/7/2012 | 6/20/2012 | Ann E. Leary | | |
| Division Set 4 | Division 4-12- GAS | 6/7/2012 | 6/20/2012 | Ann E. Leary | Att. DIV 4-12-GAS | |
| Division Set 4 | Division 4-13- GAS | 6/7/2012 | 6/19/2012 | Ann E. Leary and Michael D. Laflamme | | |
| | | | DIVIS | ION SET 5 | | |
| Division Set 5 | Division 5-1- ELEC | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | Att. DIV 5-1-ELEC | |
| Division Set 5 | Division 5-2- ELEC | 6/8/2012 | 6/29/2012 | Evelyn M. Kaye | Att. DIV 5-2-1-ELEC Att. DIV 5-2-2-ELEC Att. DIV 5-2-3-ELEC | |
| Division Set 5 | Division 5-3- ELEC | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | Att. DIV 5-3-1-ELEC Att. DIV 5-3-2-ELEC | |
| Division Set 5 | Division 5-3- ELEC (Corrected) | 6/8/2012 | 7/2/2012 | Evelyn M. Kaye | | |
| Division Set 5 | Division 5-4- ELEC | 6/8/2012 | 6/22/2012 | Evelyn M. Kaye | Att. DIV 5-4-ELEC | |
| Division Set 5 | Division 5-5- ELEC | 6/8/2012 | 6/22/2012 | Evelyn M. Kaye | Att. DIV 5-5-1-ELEC Att. DIV 5-5-2-ELEC | |

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4323 Discovery Log

| DATA SET | DATA REQUEST | DATE ISSUED | DATE FILED | WITNESS | ATTACHMENT | CONFIDENTIAL ATTACHMENT |
|----------------|------------------------|----------------|------------|----------------|--|--|
| Division Set 5 | Division 5-6- ELEC | 6/8/2012 | 6/22/2012 | Evelyn M. Kaye | Att. DIV 5-6-1-ELEC Att. DIV 5-6-2-ELEC Att. DIV 5-6-3-ELEC | |
| Division Set 5 | Division 5-7- ELEC | 6/8/2012 | 6/22/2012 | Evelyn M. Kaye | | |
| Division Set 5 | Division 5-8- ELEC | 6/8/2012 | 6/22/2012 | Evelyn M. Kaye | | |
| Division Set 5 | Division 5-9- ELEC | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | Att. DIV 5-9-ELEC | |
| Division Set 5 | Division 5-10- ELEC | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | Att. DIV 5-10-1-ELEC Att. DIV 5-10-2-ELEC | |
| Division Set 5 | Division 5-11- ELEC | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | Att. DIV 5-11-1-ELEC Att. DIV 5-11-2-ELEC Att. DIV 5-11-3-ELEC Att. DIV 5-11-4-ELEC | |
| Division Set 5 | Division 5-12- ELEC | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | | |
| Division Set 5 | Division 5-13- ELEC | 6/8/2012 | 6/22/2012 | Evelyn M. Kaye | | |
| Division Set 5 | Division 5-14- ELEC | 6/8/2012 | 6/22/2012 | Evelyn M. Kaye | Att. DIV 5-14-ELEC | |
| Division Set 5 | Division 5-15- ELEC | 6/8/2012 | 6/22/2012 | Evelyn M. Kaye | Att. DIV 5-15-ELEC | |
| Division Set 5 | Division 5-16- ELEC | 6/8/2012 | 6/29/2012 | Evelyn M. Kaye | Att. DIV 5-16-1-ELEC Att. DIV 5-16-2-ELEC Att. DIV 5-16-3-ELEC Att. DIV 5-16-4-ELEC (REDACTED) | Att. DIV 5-16-2-ELEC Att. DIV 5-16-3-ELEC Att. DIV 5-16-4-ELEC (CONFIDENTIAL) |
| | | | DIVIS | ION SET 6 | | |
| Division Set 6 | Division 6-1- GAS | 6/8/2012 | 7/2/2012 | Evelyn M. Kaye | Att. DIV 6-1-GAS | |
| Division Set 6 | Division 6-2- GAS | 6/8/2012 | 7/2/2012 | Evelyn M. Kaye | Att. DIV 6-2-1-GAS Att. DIV 6-2-2-GAS | |
| Division Set 6 | Division 6-3- GAS | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | Att. DIV 6-3-GAS | |
| Division Set 6 | Division 6-4- GAS | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | Att. DIV 6-4-1-GAS Att. DIV 6-4-2-GAS | |
| Division Set 6 | Division 6-5- GAS | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | Att. DIV 6-5-GAS | |
| Division Set 6 | Division 6-6- GAS | 6/8/2012 | 7/2/2012 | Evelyn M. Kaye | Att. DIV 6-6-1-GAS Att. DIV 6-6-2-GAS Att. DIV 6-6-3-GAS (REDACTED) | Att. DIV 6-6-2-GAS Att. DIV 6-6-3-GAS (CONFIDENTIAL) |
| Division Set 6 | Division 6-7- GAS | 6/8/2012 | 6/22/2012 | Evelyn M. Kaye | | |
| Division Set 6 | Division 6-8- GAS | 6/8/2012 | 6/22/2012 | Evelyn M. Kaye | | |
| Division Set 6 | Division 6-9- GAS | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | | |
| Division Set 6 | Division 6-10- GAS | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | Att. DIV 6-10-1-GAS Att. DIV 6-10-2-GAS | |
| Division Set 6 | Division 6-11- GAS | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | | |
| Division Set 6 | Division 6-12- GAS | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | | |
| Division Set 6 | Division 6-13- GAS | 6/8/2012 | 6/22/2012 | Evelyn M. Kaye | | |

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4323 Discovery Log

| DATA SET | DATA REQUEST | DATE ISSUED | DATE FILED | WITNESS | ATTACHMENT | CONFIDENTIAL ATTACHMENT |
|----------------|---------------------------|----------------|------------|---------------------|--|---|
| Division Set 6 | Division 6-14- GAS | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | Att. DIV 6-14-GAS | |
| Division Set 6 | Division 6-15- GAS | 6/8/2012 | 6/26/2012 | Evelyn M. Kaye | Att. DIV 6-15-1-GAS Att. DIV 6-15-2-GAS Att. DIV 6-15-3-GAS | |
| Division Set 6 | Division 6-16- GAS | 6/8/2012 | 7/2/2012 | Evelyn M. Kaye | Att. DIV 6-16-1-GAS Att. DIV 6-16-2-GAS Att. DIV 6-16-3-GAS Att. DIV 6-16-4-GAS Att. DIV 6-16-5-GAS (REDACTED) | Att. DIV 6-16-1-GAS Att. DIV 6-16-2-GAS Att. DIV 6-16-3-GAS Att. DIV 6-16-4-GAS Att. DIV 6-16-5-GAS (CONFIDENTIAL) |
| | | | DIVIS | ION SET 7 | | |
| Division Set 7 | Division 7-1- GAS | 6/12/2012 | 7/5/2012 | Evelyn M. Kaye | Att. DIV 7-1-GAS | |
| Division Set 7 | Division 7-2- ELEC | 6/12/2012 | 7/5/2012 | Evelyn M. Kaye | Att. DIV 7-2-GAS | |
| Division Set 7 | Division 7-3- ELEC/GAS | 6/12/2012 | 7/5/2012 | Evelyn M. Kaye | Att. DIV 7-3-1-ELEC/GAS Att. DIV 7-3-2-ELEC/GAS Att. DIV 7-3-3-ELEC/GAS | |
| Division Set 7 | Division 7-4- ELEC/GAS | 6/12/2012 | 7/5/2012 | Evelyn M. Kaye | | |
| Division Set 7 | Division 7-5- ELEC/GAS | 6/12/2012 | 6/28/2012 | Evelyn M. Kaye | Att. DIV 7-5-ELEC/GAS | |
| Division Set 7 | Division 7-6- ELEC | 6/12/2012 | 6/25/2012 | Evelyn M. Kaye | | |
| Division Set 7 | Division 7-7- GAS | 6/12/2012 | 6/25/2012 | Evelyn M. Kaye | | |
| Division Set 7 | Division 7-8- ELEC/GAS | 6/12/2012 | 6/28/2012 | Evelyn M. Kaye | | |
| | | | DIVIS | ION SET 8 | | |
| Division Set 8 | Division 8-1- ELEC | 6/14/2012 | 6/25/2012 | Michael D. Laflamme | Att. DIV 8-1-ELEC | |
| Division Set 8 | Division 8-2- ELEC | 6/14/2012 | 6/25/2012 | Michael D. Laflamme | Att. DIV 8-2-ELEC | |
| Division Set 8 | Division 8-3- ELEC | 6/14/2012 | 7/3/2012 | Michael D. Laflamme | Att. DIV 8-3-ELEC | |
| Division Set 8 | Division 8-4- ELEC | 6/14/2012 | 6/25/2012 | Michael D. Laflamme | | |
| Division Set 8 | Division 8-5- ELEC | 6/14/2012 | 7/5/2012 | Michael D. Laflamme | Att. DIV 8-5-ELEC | |
| Division Set 8 | Division 8-6- ELEC | 6/14/2012 | | Michael D. Laflamme | | |
| Division Set 8 | Division 8-7- ELEC | 6/14/2012 | | Maureen P. Heaphy | | |
| Division Set 8 | Division 8-8- ELEC | 6/14/2012 | 6/25/2012 | Michael D. Laflamme | | |
| Division Set 8 | Division 8-9- ELEC | 6/14/2012 | 6/27/2012 | Michael D. Laflamme | | |
| Division Set 8 | Division 8-10- ELEC | 6/14/2012 | 6/25/2012 | Michael D. Laflamme | | |
| Division Set 8 | Division 8-11- ELEC | 6/14/2012 | 6/27/2012 | Michael D. Laflamme | | |
| Division Set 8 | Division 8-12- ELEC | 6/14/2012 | 6/27/2012 | Michael D. Laflamme | | |
| Division Set 8 | Division 8-13- ELEC | 6/14/2012 | | Michael D. Laflamme | | |

| DATA SET | DATA REQUEST | DATE ISSUED | DATE FILED | WITNESS | ATTACHMENT | CONFIDENTIAL ATTACHMENT | | | | | |
|-----------------|------------------------|----------------|------------|--------------------------------------|--|----------------------------|--|--|--|--|--|
| Division Set 8 | Division 8-14- ELEC | 6/14/2012 | 6/27/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 8 | Division 8-15- ELEC | 6/14/2012 | 6/27/2012 | Michael D. Laflamme | Att. DIV 8-15-1-ELEC Att. DIV 8-15-2-ELEC | | | | | | |
| Division Set 8 | Division 8-16- ELEC | 6/14/2012 | 6/27/2012 | Michael D. Laflamme | Att. DIV 8-16-ELEC | | | | | | |
| | DIVISION SET 9 | | | | | | | | | | |
| Division Set 9 | Division 9-1- GAS | 6/14/2012 | 7/2/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 9 | Division 9-2- GAS | 6/14/2012 | 7/2/2012 | Michael D. Laflamme | Att. DIV 9-2-GAS | | | | | | |
| Division Set 9 | Division 9-3- GAS | 6/14/2012 | 6/27/2012 | Michael D. Laflamme | | | | | | | |
| Division Set 9 | Division 9-4- GAS | 6/14/2012 | 6/27/2012 | Michael D. Laflamme & Susan L. Fleck | | | | | | | |
| Division Set 9 | Division 9-5- GAS | 6/14/2012 | 6/27/2012 | A. Leo Silvestrini | | | | | | | |
| Division Set 9 | Division 9-6- GAS | 6/14/2012 | 6/27/2012 | A. Leo Silvestrini | Att. DIV 9-6-GAS | | | | | | |
| Division Set 9 | Division 9-7- GAS | 6/14/2012 | 6/27/2012 | A. Leo Silvestrini | | | | | | | |
| Division Set 9 | Division 9-8- GAS | 6/14/2012 | 6/27/2012 | A. Leo Silvestrini | Att. DIV 9-8-GAS | | | | | | |
| Division Set 9 | Division 9-9- GAS | 6/14/2012 | 6/27/2012 | A. Leo Silvestrini | | | | | | | |
| | | | DIVIS | ION SET 10 | | | | | | | |
| Division Set 10 | Division 10-1- ELEC | 6/22/2012 | 7/3/2012 | Howard S. Gorman | Att. DIV 10-1-1-ELEC Att. DIV 10-1-2-ELEC | | | | | | |
| Division Set 10 | Division 10-2- ELEC | 6/22/2012 | 7/3/2012 | Jeanne A. Lloyd | Att. DIV 10-2-1-ELEC Att. DIV 10-2-2-ELEC Att. DIV 10-2-3-ELEC Att. DIV 10-2-4-ELEC Att. DIV 10-2-5(1)-ELEC to Att. DIV 10-2-5(1)-ELEC Att. DIV 10-2-3-ELEC Att. DIV 10-2-4-ELEC Att. DIV 10-2-5-ELEC Att. DIV 10-2-6-ELEC Att. DIV 10-2-6-ELEC Att. DIV 10-2-7-ELEC Att. DIV 10-2-8-ELEC Att. DIV 10-2-8-ELEC | | | | | | |
| Division Set 10 | Division 10-3- ELEC | 6/22/2012 | 7/5/2012 | Evelyn M. Kaye | Att. DIV 10-3-1-ELEC Att. DIV 10-3-2-ELEC | | | | | | |
| Division Set 10 | Division 10-4- ELEC | 6/22/2012 | 7/3/2012 | Alfred P. Morrissey | Att. DIV 10-4-ELEC | | | | | | |
| Division Set 10 | Division 10-5- ELEC | 6/22/2012 | 7/5/2012 | Howard S. Gorman | Att. DIV 10-5-ELEC | | | | | | |
| Division Set 10 | Division 10-6- ELEC | 6/22/2012 | 6/28/2012 | Howard S. Gorman | | | | | | | |
| Division Set 10 | Division 10-7- ELEC | 6/22/2012 | 6/28/2012 | Howard S. Gorman | Att. DIV 10-7-ELEC | | | | | | |
| Division Set 10 | Division 10-8- ELEC | 6/22/2012 | 6/28/2012 | Howard S. Gorman | | | | | | | |

| DATA SET | DATA REQUEST | DATE ISSUED | DATE FILED | WITNESS | ATTACHMENT | CONFIDENTIAL ATTACHMENT | | | | |
|------------------|------------------------------|----------------|------------|--|--|----------------------------|--|--|--|--|
| | COMMISSION SET 1 | | | | | | | | | |
| Commission Set 1 | Commission 1-1- ELEC/GAS | 5/24/2012 | 6/6/2012 | Michael D. Laflamme | | | | | | |
| Commission Set 1 | Commission 1-2- ELEC/GAS | 5/24/2012 | 6/7/2012 | Maureen P. Heaphy | | | | | | |
| Commission Set 1 | Commission 1-3- ELEC/GAS | 5/24/2012 | 6/7/2012 | Michael D. Laflamme | Att. COMM 1-3-1-ELEC/GAS Att. COMM 1-3-2-ELEC/GAS | | | | | |
| Commission Set 1 | Commission 1-4- ELEC/GAS | 5/24/2012 | 6/7/2012 | Timothy D. Horan | | | | | | |
| Commission Set 1 | Commission 1-5- ELEC/GAS | 5/24/2012 | 6/6/2012 | Maureen P. Heaphy | | | | | | |
| Commission Set 1 | Commission 1-6- ELEC | 5/24/2012 | 6/7/2012 | Stephen F. Doucette and Maureen P. Heaphy | | | | | | |
| Commission Set 1 | Commission 1-7- ELEC | 5/24/2012 | 6/7/2012 | Stephen F. Doucette and Maureen P. Heaphy | | | | | | |
| Commission Set 1 | Commission 1-8- ELEC | 5/24/2012 | 6/6/2012 | Stephen F. Doucette | | | | | | |
| Commission Set 1 | Commission 1-9- ELEC | 5/24/2012 | 6/7/2012 | Stephen F. Doucette and Maureen P. Heaphy | | | | | | |
| Commission Set 1 | Commission 1-10- ELEC | 5/24/2012 | 6/6/2012 | Stephen F. Doucette | | | | | | |
| Commission Set 1 | Commission 1-11- ELEC | 5/24/2012 | 6/6/2012 | Stephen F. Doucette | | | | | | |
| Commission Set 1 | Commission 1-12- ELEC | 5/24/2012 | 6/6/2012 | Stephen F. Doucette | | | | | | |
| Commission Set 1 | Commission 1-13- ELEC/GAS | 5/24/2012 | 6/4/2012 | Evelyn M. Kaye | | | | | | |
| Commission Set 1 | Commission 1-14- ELEC/GAS | 5/24/2012 | 6/4/2012 | Evelyn M. Kaye | | | | | | |
| Commission Set 1 | Commission 1-15- ELEC/GAS | 5/24/2012 | 6/6/2012 | Evelyn M. Kaye | | | | | | |
| Commission Set 1 | Commission 1-16- ELEC/GAS | 5/24/2012 | 6/4/2012 | Evelyn M. Kaye and Michael D. Laflamme | | | | | | |
| Commission Set 1 | Commission 1-17- ELEC/GAS | 5/24/2012 | 6/4/2012 | Evelyn M. Kaye | | | | | | |
| Commission Set 1 | Commission 1-18- ELEC/GAS | 5/24/2012 | 6/4/2012 | Evelyn M. Kaye | | | | | | |
| Commission Set 1 | Commission 1-19- ELEC/GAS | 5/24/2012 | 6/4/2012 | Evelyn M. Kaye | Att. COMM 1-19-ELEC/GAS | | | | | |
| Commission Set 1 | Commission 1-20- ELEC | 5/24/2012 | 6/6/2012 | Michael R. Hrycin | Att. COMM 1-20-1-ELEC Att. COMM 1-20-2-ELEC | | | | | |
| Commission Set 1 | Commission 1-21- ELEC | 5/24/2012 | 6/6/2012 | Michael R. Hrycin | Att. COMM 1-21-ELEC | | | | | |
| Commission Set 1 | Commission 1-22- ELEC | 5/24/2012 | 6/6/2012 | Michael R. Hrycin | Att. COMM 1-22-ELEC | | | | | |
| Commission Set 1 | Commission 1-23- ELEC | 5/24/2012 | 6/7/2012 | Michael R. Hrycin | | | | | | |
| Commission Set 1 | Commission 1-24- ELEC | 5/24/2012 | 6/7/2012 | Michael R. Hrycin | | | | | | |
| Commission Set 1 | Commission 1-25- ELEC | 5/24/2012 | 6/6/2012 | Michael R. Hrycin | | | | | | |
| Commission Set 1 | Commission 1-26- ELEC | 5/24/2012 | 6/6/2012 | Michael R. Hrycin | | | | | | |
| Commission Set 1 | Commission 1-27- GAS | 5/24/2012 | 6/6/2012 | Jeffrey P. Martin | | | | | | |
| Commission Set 1 | Commission 1-28- GAS | 5/24/2012 | 6/6/2012 | Jeffrey P. Martin | | | | | | |
| Commission Set 1 | Commission 1-29- ELEC | 5/24/2012 | 6/4/2012 | Alfred P. Morrissey | | | | | | |

| | | | discovery Log | | | |
|------------------|------------------------------|----------------|---------------|-----------------------------|-------------------------|----------------------------|
| DATA SET | DATA REQUEST | DATE ISSUED | DATE FILED | WITNESS | ATTACHMENT | CONFIDENTIAL ATTACHMENT |
| | | | COMM | IISSION SET 1 | | |
| Commission Set 1 | Commission 1-30- ELEC | 5/24/2012 | 6/4/2012 | Alfred P. Morrissey | | |
| Commission Set 1 | Commission 1-31- ELEC | 5/24/2012 | 6/4/2012 | Alfred P. Morrissey | | |
| Commission Set 1 | Commission 1-32- ELEC | 5/24/2012 | 6/4/2012 | Alfred P. Morrissey | | |
| Commission Set 1 | Commission 1-33- ELEC | 5/24/2012 | 6/7/2012 | Alfred P. Morrissey | | |
| Commission Set 1 | Commission 1-34- ELEC | 5/24/2012 | 6/7/2012 | Alfred P. Morrissey | | |
| Commission Set 1 | Commission 1-35- ELEC/GAS | 5/24/2012 | 6/6/2012 | Michael D. Laflamme | | |
| Commission Set 1 | Commission 1-36- ELEC/GAS | 5/24/2012 | 6/7/2012 | Michael D. Laflamme | Att. COMM 1-36-ELEC/GAS | |
| Commission Set 1 | Commission 1-37- GAS | 5/24/2012 | 6/7/2012 | Michael D. Laflamme | | |
| Commission Set 1 | Commission 1-38- ELEC | 5/24/2012 | 6/6/2012 | Michael D. Laflamme | | |
| Commission Set 1 | Commission 1-39- ELEC/GAS | 5/24/2012 | 6/7/2012 | Michael D. Laflamme | | |
| Commission Set 1 | Commission 1-40- ELEC/GAS | 5/24/2012 | 6/7/2012 | Ann E. Leary & Jeanne Lloyd | Att. COMM 1-40-ELEC/GAS | |
| Commission Set 1 | Commission 1-41- ELEC/GAS | 5/24/2012 | 6/6/2012 | Robert B. Hevert | | |
| Commission Set 1 | Commission 1-42- ELEC/GAS | 5/24/2012 | 6/6/2012 | Michael D. Laflamme | | |
| Commission Set 1 | Commission 1-43- ELEC/GAS | 5/24/2012 | 6/6/2012 | Michael D. Laflamme | | |
| Commission Set 1 | Commission 1-44- ELEC/GAS | 5/24/2012 | 6/7/2012 | Maureen P. Heaphy | Att. COMM 1-44-ELEC/GAS | |
| Commission Set 1 | Commission 1-45- ELEC/GAS | 5/24/2012 | 6/6/2012 | Stephen F. Doucette | | |
| Commission Set 1 | Commission 1-46- GAS | 5/24/2012 | 6/7/2012 | Ann E. Leary | | |

Division 7-1-GAS

Request:

Reference Kaye testimony, page 3, lines 13-20. Please provide all work papers, analyses, data and studies which specifically support the correlation relationship between gas commodity prices and the Company's level of uncollectible expense.

Response:

The Company has not explicitly studied the correlation between gas supply prices and the level of uncollectible expense because this impact is largely intuitive given the time of year when larger bills and arrears balances are incurred and the lag until an account is terminated and subsequently written off. Exacerbating the build-up of accounts receivable and subsequent termination and write-off is the winter moratorium. Please refer to Attachment DIV 7-1-GAS, which is provided in electronic format and includes the work papers that supported Schedule EMK-2 in the Direct Testimony of Company Witness Evelyn M. Kaye. This schedule depicts the lag between the winter period when higher bills are naturally incurred (and intensified at times when GCR rates have been relatively greater) and the ultimate write off of these accounts.

Division 7-2-ELEC

Request:

Reference Kaye testimony, page 3, lines 13-20. Please provide all work papers, analyses, data and studies which specifically support the correlation relationship between electric supply prices and the Company's level of uncollectible expense.

Response:

The Company has not explicitly studied the correlation between electric supply prices and the level of uncollectible expense because this impact is largely intuitive given the time of year when larger bills and arrears balances are incurred and the lag until an account is terminated and subsequently written off. That being said, please refer to Attachment DIV 7-2-ELEC which is being provided in electronic format and contains the workpapers that supported Schedule EMK-3 in the Direct Testimony of Company Witness Evelyn M. Kaye.

Division 7-3-ELEC/GAS

Request:

Reference Kaye testimony, page 9, lines 1-16.

- a) Please provide the number of accounts, type of accounts (i.e., standard-residential protected residential and non-residential) and total incremental increase in accounts receivable resulting from suspending outbound calling and field collection activity between August and October 2011.
- b) Please explain how the Company identifies and quantifies the accounts and dollars impacted as result of the suspended collection activities.
- c) Please provide the number and type of accounts and total incremental increase in accounts receivable, which were "pushed" into the Winter Moratorium Period.
- d) Please provide the final anticipated impact to charge-offs as a result of the suspended collection activity between August 2011 and October 2011.
- e) Please provide an explanation of the Company's subsequent collection treatment strategies, activities and customer account management processes specifically designed and implemented to mitigate the impact of the suspended collection activity between August 2011 and October 2011.

Response:

a), b) and c): The Company had done a high level analysis in the last quarter of 2011 of the forgone collections opportunities related to the suspension of field activities and outbound calling last year. These studies were not drilled down to the account level detail by standard residential, protected residential and so on.

FIELD: Please see Attachment DIV 7-3-1-ELEC/GAS for a summary of the estimated impacts due to suspended field action.

Calculating the dollar amounts not collected is straightforward. A per day average dollar amount collected for a particular month using the prior year's data is determined. That amount is then multiplied by the number of days that field collection actions were suspended for an area to get to the total amount not collected.

Division 7-3-ELEC/GAS, page 2

Calculating the potential dollars collected post cut-out for non-payment ("CONP") is more involved. A data table from field collections results for the comparable test month in the prior year is developed. This table contains all of the account numbers that were CONP during this test month. This table is then joined to a system table that contains records of all payments made on an account. It is assumed that any payment made on an account <=10 days after the CONP date was a payment that was made directly as a result of the CONP. From this the average dollars collected post-CONP is calculated, as is the average number of CONPs per day. Thus, a per day average of dollars collected post-CONP is determined.

(For the late October 2011 snowstorm, the estimated suspension of field activity was only one day for Narragansett Gas. Hence, this is ignored within that section of Attachment DIV 7-3-1-ELEC/GAS.)

OUTBOUND COLLECTIONS CALLING: Please see Attachment DIV 7-3-2-ELEC/GAS for a summary of the estimated impacts due to suspended collections calling activity. It should be noted that the Company did not stop making calls to gas customers during the two major storms. Therefore, analysis only for Narragansett Electric customers analysis was undertaken.

Please see Attachment DIV 7-3-3-ELEC/GAS for the work paper assumptions and calculations.

d) The estimated write-off from the suspension of activities is shown by the following:

Reserve Rate

Rhode Island-49 Cost \$1,462,993 12.35% 180,679.69 = \$181 thousand

e) The storms related to Tropical Storm Irene impacted National Grid's collection activity for close to two weeks. Once the suspension was lifted, the Company resumed the usual collection activities. The late October snow storm was at the end of the termination season so the winter moratorium collection procedures commenced.

The Narragansett Electric Compmany d/b/a National Grid R.I.P.U.C. Docket No. 4323 Attachment DIV 7-3-1-ELEC/GAS Page 1 of 1

LOST COLLECTIONS DUE TO TROPICAL STORM IRENE

| | | Daily | | | | | | | | |
|-------------|-----------|-----------|-----------|--------------|-----------|----|-------------|--|--|--|
| | | \$ Post | | | By 5 Days | | | | | |
| | \$ Field | CONP | Total | Jurisdiction | Lost | | Total | | | |
| MA Electric | \$32,123 | \$45,340 | \$77,463 | MA | \$387,315 | MA | \$801,900 | | | |
| MA Gas | \$24,771 | \$58,146 | \$82,917 | MA | \$414,585 | | | | | |
| NH Electric | \$959 | \$768 | \$1,727 | NH | \$8,635 | NH | \$116,155 | | | |
| NH Gas | \$3,704 | \$17,800 | \$21,504 | NH | \$107,520 | | | | | |
| NY CSS | \$12,911 | \$24,475 | \$37,386 | NY | \$186,930 | NY | \$1,783,260 | | | |
| NYC Gas | \$48,650 | \$89,712 | \$138,362 | NY | \$691,810 | | | | | |
| LI Elec | \$59,606 | \$42,483 | \$102,089 | NY | \$510,445 | | | | | |
| LI Gas | \$33,010 | \$45,805 | \$78,815 | NY | \$394,075 | | | | | |
| RI Electric | \$11,992 | \$28,582 | \$40,574 | RI | \$202,870 | RI | \$405,875 | | | |
| RI Gas | \$2,113 | \$38,488 | \$40,601 | RI | \$203,005 | | | | | |
| | \$229.839 | \$391.599 | \$621,438 | | | | | | | |

LOST COLLECTIONS DUE TO OCT/NOV 2011 SNOW STORM

| Estimated | Ν | lovember | 2011 | CSS | CO's | s Per D |)av |
|-----------|---|----------|------|-----|------|---------|-----|
|-----------|---|----------|------|-----|------|---------|-----|

| | | \$ Post | | Missed Days | |
|-------------|----------|-----------|-----------|-------------|-----------|
| | \$ Field | CONP | Total | Oct/Nov'11 | |
| MA Electric | \$24,598 | \$72,662 | \$97,260 | 3.75 | \$364,725 |
| NH Electric | \$397 | \$3,318 | \$3,715 | 3.75 | \$13,931 |
| RI Electric | \$9,227 | \$28,565 | \$37,792 | 3.75 | \$141,720 |
| NY CSS | \$31,000 | \$103,014 | \$134,014 | 3.50 | \$469,049 |

| | FIELI | D | \$ Post | CONP |
|----|----------------|----------|-------------|-------------|
| | | Per Day | | |
| | Prior Yr 11/10 | Avg (1) | (2) | Per Day Avg |
| NY | \$588,993 | \$31,000 | \$1,957,268 | \$103,014 |
| MA | \$491,951 | \$24,598 | \$1,380,587 | \$72,662 |
| NH | \$7,938 | \$397 | \$63,042 | \$3,318 |
| RI | \$184,541 | \$9,227 | \$542,733 | \$28,565 |

- (1) Divided by # of available days to collect in those jurisdictions.
- (2) Payments Received w/in 10 days prior year.

Estimated Loss in Collections from Storms

[Optional comments]

Tornado

Shut down all Massachusetts calls June 6th- June 16th

Estimated Loss

KEDNE \$ 1,887,022 NGNE-MECC \$ 1,907,274

\$ 3,794,296

Tropical Storm Irene

Effected both Gas and Electric operations No Calls made Aug 27th, 29th, 30th, 31st- NE No call made Aug 27th, 29th, 31st- NY

Estimated Loss

KEDNE \$ 473,661 KEDNY \$ 952,177

NGNE \$ 1,208,885 **Rhode Island-49** \$ **265,955**

NGNY-12 \$ 1,937,619 KEDLI \$ 103,614

\$ 4,675,956

Flooding caused by Tropical Storm Irene

No Calls made 9/1-9-11 All of NE and LI No Calls made 9/1-9/05 in all of NY (Eastern)

Esitmated Loss

 KEDNE
 \$ 1,004,235

 KEDNY
 \$ 783,104

 NGNY-12
 \$ 2,808,968

NGNE \$ 3,647,845 **Rhode Island-49 \$ 802,526**

KEDLI \$ 247,531

\$ 8,491,683

Snow in late October

No Calls Made In NY on 10/31

No Calls made in NE 10/31- 11/03 (CSS)

No Calls made in KEDNE 10/31-11/08

Estimated Loss

NGNY-12 \$ 1,151,552

NGNE \$ 1,793,240 **Rhode Island-49 \$ 394,513**

KEDNE \$ 344,306

\$ 3,289,097

Total Estimated Loss from Storms

\$ 20,251,032

NGNY-12 \$ 5,898,138

Rhode Island-49 \$ 1,462,993

Total \$ 7,361,132

Estimated Loss in Collections from Storms

Tornado Shut down all Massachusetts calls June 6th- June 16th

CRIS and CSS

Shut down all of Mass (05) calls NCI June 6th- June 16th

CRIS and CSS

CSS Collections

Last years Collections (same timeframe) 06/07/10-06/17/10

ALLED 3_DAY 7_DAY 10_DAY TOTAL 293,769 \$ 950,981 \$ 1,867,797 **\$ 2,202,456** \$ 2,817,384 DATE_CALLED

June 11 Collections

06/20/11-06/30/2011(Same amount of days- actual collections this June)

DATE_CALLED 3_DAY 7_DAY 10_DAY TOTAL 183,174 \$ 629,755 \$ 1,356,703 \$ 1,612,092 \$ 2,046,014

\$ 3,146,504

Average Lost for CSS 1,907,274

KEDNE Collections

Actuals Total \$ collected

June '10 \$5,467,909 \$210,304.18 \$ collected per day Days of collections

June '11 Days of Collections 2005202.38

12 \$ 167,100

Average Lost per day \$ 188,702 Didn't make calls for 10 days

1,887,022

Total CSS Lost Collections

Tropical Storm Irene- Both Electric and gas

| Estimated Loss New England 2011 8/06/11-08/10/11- Actual Collections 08/13/11-08/17/11- Actual 08/20/11-08/24/11- Actual August 2011 3- week Average 2010 08/28/10-9/1/2010 | \$ 1,0 \$ 1,0 \$ 1,0 | 32,249 958,103 978,512 956,288 | 0.22 227,095 232,783 237,273 232,383 | CRIS KEDNY Gas Boston Gas Essex Gas Colonial Cape & Energy North Ga | | 2010 224,435 86,302 4,177 15,282 12,815 | \$ 25 \$ 8 \$ 4 \$ 1 | 2011 1,653 2,051 4,254 7,866 4,082 | \$ 84,177 \$ 4,216 \$ 16,574 | 952,176.61 336,706.80 16,862.83 66,297.00 53,794.26 | 473,660.89 |
|---|----------------------------|--|--|--|---------------------------|---|-------------------------------|---|------------------------------------|---|------------|
| Average 2010 &2011 | | 08,885 \$ | 265,955 | | | | 10-Day Los | is | \$ 1,425,837.50 | | |
| New York 08/06-08/08, 08/10 -Actual Collections 08/13-08/15 08/17-Actual Collections 08/20-08/22, 08/24- Actual Collections August 2011 3- week Average | \$ 1,7 \$ 1,9 | 967,630 (28,419 189,368 19 5,139 | | Total Loss from I CRIS CSS KEDLI | rene \$ \$ \$ \$ \$ \$ \$ | 1,425,837.50 3,146,504 103,613.62 4,675,955.58 | | | | | |
| 08/28-08/30, 09/01 -2010 | \$ 1,9 | 80,099 | | | | | | | | | |
| Average 2010 &2011 | \$ 1,9 | 37,619 | | | | | | | | | |

\$ 1,907,274

KEDLI
Average Daily \$ collected per day
\$ 20,723

103,614

Flooding caused by Tropical Storm Irene

NE CSS no calls made 9/1/2011- 9/10/2011

| 2010 09/02/2010-09/11/2010 actua One Day average | 2,674,503 577,648 | 4,621,187 | 0.29 | Total Estimate NE NY | ed lost from FI \$ \$ | 3,647,845 2,808,968 |
|--|----------------------|--|--------------|----------------------------|-----------------------------|------------------------|
| Total Lost | | 3,647,845 | 1,057,875.12 | | | 6,456,813 |
| 09/02/2010-09/05/2010 Actual New York 3-days | 521,599 | 1,140,871 2,086,396 1,613,633 | | | | |

Excluded Data

09/06/2011 Exclude 518 area code 09/07/2011 Exclude 518 area code 09/08/2011 Exclude 315,607,and 518 area codes 09/09/2011 Exclude 315,607,and 518 area codes 09/10/2011 Exclude 315,607,and 518 area codes

| 2010 | | | | 2011 | | | | |
|------------|-------------------|----------------|-----|------------|------------------------|----------|-----|------------|
| | Accounts Received | Total Callable | | A | Accounts Receive Total | Callable | | Difference |
| 09/07/2010 | 10951 | 9,596 | 88% | 09/06/2011 | 22,734 | 15,711 | 69% | -19% |
| 09/08/2010 | 30405 | 29,139 | 96% | 09/07/2011 | 28,495 | 21,214 | 74% | -21% |
| 09/09/2010 | 27367 | 26,024 | 95% | 09/08/2011 | 23,158 | 9,083 | 39% | -56% |
| 09/10/2010 | 26395 | 25,133 | 95% | 09/09/2011 | 12,276 | 8,281 | 67% | -28% |
| 09/11/2010 | 24585 | 23,572 | 96% | 09/10/2011 | 15,632 | 7,932 | 51% | -45% |
| | | | | | | | | |

| ual Arrears collected | | |
|-----------------------|--|--|
| 360776.251 | -66811.27619 | 293964.9748 |
| 360776.251 | -77163.04951 | 283613.2015 |
| 360776.251 | -201568.4428 | 159207.8082 |
| 360776.251 | -100158.5769 | 260617.6741 |
| 360776.251 | -162845.5023 | 197930.7487 |
| | 360776.251 360776.251 360776.251 360776.251 | 360776.251 -66811.27619 360776.251 -77163.04951 360776.251 -201568.4428 360776.251 -100158.5769 |

\$ 1,195,334

KEDNE/NY

| Total Arrears collected | Sep '10 # days of | collections | | | | |
|-------------------------|-------------------|-------------|---------------|--------------|-------------|--------------|
| KEDNY | 4,894,399 | 25 | \$ 195,776 | 783,103.87 | 1223599.803 | 1,003,351.84 |
| KEDNE | 2,510,588 | 25 | \$ 100,424 | 1,004,235.12 | 1255293.905 | 1,129,764.51 |

Snow in late October

| 09/12/2011-09/16/2011 | | | | | | | | 3_ | DAY | 7_DAY | 10_DAY | TOTAL | NUM_PMT UN | IIQ_AC(SUCCESSFUL |
|-----------------------|--------------------|-----------------|------------|-----------|----------------------------|-----------|------------|----------|-----------|----------|---------|----------|------------|-------------------|
| DATE_CALLED 3_DAY | 7_DAY | 10_DAY | TOTAL | | | | | | 7224.52 | 17936.3 | 24,215 | 26259.42 | 143 | 133 NULL |
| 474210 | 1332008.83 1332008 | 3.83 1332008.83 | 1482279.26 | | | | | | 613.83 | 2159.05 | 2,411 | 2474.08 | 17 | 15 NULL |
| | | 266401.766 | | | | | | | 50 | 610.13 | 785 | 945.26 | 7 | 6 NULL |
| | | | | | | | | | 6062.87 | 18284.17 | 24,245 | 28728.21 | 180 | 175 NULL |
| 09/07/2010-09/11/2010 | | | | | | | | | 0 | 335.92 | 354 | 354.35 | 2 | 1 NULL |
| | | | | | | | | | 45514.22 | | 112,658 | 116155 | 718 | 674 NULL |
| DATE_CALLED 3_DAY | 7_DAY | | TOTAL | | | | | | 274570.59 | | 715,700 | 724486.6 | 4696 | 4510 NULL |
| 277008 | 1,040,938 1,929,7 | | | | | | | | | 2461.55 | 2,922 | 2924.55 | 15 | 15 NULL |
| | | 455150.736 | | | | | | | 12958.34 | 20942.54 | 32,234 | 34465.32 | 214 | 198 NULL |
| | | | | | | | | | 0 | 0 | 50 | 50 | 1 | 1 NULL |
| | | 360776.251 | | | | | | | 0 | 0 | - | 0 | 0 | 0 NULL |
| | | | | | | | | | 0 | 0 | - | 0 | 0 | 0 NULL |
| 2010 | 10 FinalBill | CALLED | 49 | 19 | 1,281 | 1,281 | 1281.41 | 0 | 407.26 | 543.44 | 543 | 587.25 | 8 | 7 NULL |
| 2010 | 10 preterm | CALLED | 12 | 8250 | 9,202,139 | 9,198,801 | 9202139.07 | 84332 | 275817.17 | 424927 | 532,193 | 578155.8 | 2577 | 2382 NULL |
| 2010 | 10 reminder | CALLED | 4 | 18 | 1,888 | 1,888 | 1888.47 | 152 | 259.95 | 596.99 | 715 | 1152.7 | 8 | 8 NULL |
| 2010 | 10 reminder | CALLED | 5 | 3122 | 389,024 | 389,024 | 389024.45 | 13114 | | | 169,668 | 232371.6 | 1458 | 1414 NULL |
| 2010 | 10 reminder | CALLED | 12 | 5149 | 805,343 | 805,343 | 805342.83 | 44602.91 | 211279.64 | | | 547837.2 | 2839 | 2712 NULL |
| 2010 | 10 reminder | CALLED | 41 | 143 | 18,695 | 18,695 | 18695.34 | 211.55 | | 7314.64 | 9,890 | 12909.41 | 87 | 83 NULL |
| 2010 | 10 reminder | CALLED | 49 | 1234 | 181,179 | 181,179 | 181178.97 | 8473.24 | 47437.34 | 77365.61 | 93155.8 | 125632.9 | 701 | 667 NULL |
| | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| | | | | т. | 4-1 4 | -£!!# | | 400.005 | | | | | | |
| | | | | | tal Arrers collected/ days | | | 128,935 | | | | | | |
| | | | NY \$ | 903,676 | 681,316 | | 792,496 | | | | | | | |
| | | | NE \$ | 1,189,545 | 503355.7208 | 5 | 846,451 | | | | | | | |
| | | | * | ,, | | | , | | | | | | | |

11/02- 11/04

| Year Month | Call_Type | GROUP | CD_CO | Expr1 | 5 | SAMPLE ARRE/Actu | ual Begin Arrears | AT_ORIG_NTC_1D | DATE CALLED 3 | B DAY | 7 DAY 1 | 10 DAY | TOTAL | NUM PMTU | NIQ ACCSUCCES | SSFUI |
|------------|------------------|--------|-------|-------|-------|------------------|-------------------|----------------|---------------|-----------|-----------|----------|-----------|----------|---------------|-------|
| 2010 | 11 Disconnect | CALLED | | 4 | 9 | 1977.14 | 1977.14 | 1977.14 | 141.62 | 141.62 | 641.33 | 641.33 | | 2 | 2 NULL | |
| 2010 | 11 Disconnect | CALLED | | 5 | 2136 | 493459.43 | 493459.43 | 493459.43 | 9355.8 | 31709.39 | 58292.11 | 68374.59 | 79532.38 | 532 | 506 NULL | |
| 2010 | 11 Disconnect | CALLED | | 12 | 1361 | 1519458.22 | 1519458.22 | 1519458.22 | 17415.98 | 43330.36 | 76054.17 | 101145.1 | 103526.37 | 626 | 611 NULL | |
| 2010 | 11 Disconnect | CALLED | | 41 | 76 | 31489.58 | 31489.58 | 31489.58 | 1006.07 | 1488.89 | 2886.4 | 3434.49 | 4177.31 | 26 | 25 NULL | |
| 2010 | 11 Disconnect | CALLED | | 49 | 824 | 179611.42 | 179611.42 | 179611.42 | 6056.03 | 17501.33 | 29892.53 | 38024.63 | 46971.1 | 276 | 266 NULL | |
| 2010 | 11 DPA | CALLED | | 4 | 8 | 3293.65 | 3293.65 | 3293.65 | 81.38 | 81.38 | 581.38 | 881.38 | 924.17 | 3 | 3 NULL | |
| 2010 | 11 DPA | CALLED | | 5 | 2442 | 751348.11 | 750640.27 | 751348.11 | 23455.73 | 51973.22 | 93799.97 | 110984.1 | 118484.9 | 819 | 788 NULL | |
| 2010 | 11 DPA | CALLED | | 12 | 7502 | 6541581.86 | 6541271.06 | 6541581.86 | 57998.4 | 156368.32 | 314269.18 | 382471.1 | 392832.21 | 2756 | 2665 NULL | |
| 2010 | 11 DPA | CALLED | | 41 | 65 | 15905.45 | 15905.45 | 15905.45 | 590.37 | 990.27 | 2337.11 | 3012.2 | 3349.29 | 27 | 24 NULL | |
| 2010 | 11 DPA | CALLED | | 49 | 965 | 312681.5 | 312013.16 | 312681.5 | 8865.16 | 20260.63 | 36796.12 | 43576.16 | 47972.96 | 309 | 292 NULL | |
| 2010 | 11 FinalBill | CALLED | | 4 | 6 | 353.92 | 353.92 | 353.92 | 0 | 0 | 52.17 | 76.68 | 76.68 | 2 | 2 NULL | |
| 2010 | 11 FinalBill | CALLED | | 5 | 550 | 38267.21 | 38267.21 | 38267.21 | 950.78 | 5571.94 | 10777.98 | 13558.96 | 14222.96 | 243 | 237 NULL | |
| 2010 | 11 FinalBill | CALLED | | 12 | 1177 | 107875.33 | 107875.33 | 107875.33 | 3867.84 | 13368.22 | 28083.87 | 31478.38 | 33951.69 | 455 | 447 NULL | |
| 2010 | 11 FinalBill | CALLED | | 41 | 11 | 824.7 | 824.7 | 824.7 | 0 | 90.69 | 90.69 | 90.69 | | 1 | 1 NULL | |
| 2010 | 11 FinalBill | CALLED | | 49 | 155 | 11978.44 | 11978.44 | 11978.44 | 149.91 | 1650.35 | 3008.18 | 4084.57 | 4289.26 | 74 | 72 NULL | |
| 2010 | 11 INVESTIGATION | CALLED | | 12 | 1485 | 1767400.87 | 1764298.06 | 1767400.87 | 18994.94 | 73805.41 | 101163.89 | 112807.5 | 123093.24 | 589 | 566 | 1 |
| 2010 | 11 INVESTIGATION | CALLED | | 12 | 9273 | 14702008.21 | 14673722.63 | 14702008.21 | 61055.09 | 158550.73 | | 410750.6 | | 2033 | 1944 | 0 |
| 2010 | 11 reminder | CALLED | | 4 | 49 | 15194.53 | 15194.53 | 15194.53 | 1376.21 | 6355.58 | 8665.92 | 8768.92 | | 24 | 23 NULL | |
| 2010 | 11 reminder | CALLED | | 5 | 10668 | 1443602.38 | 1443602.38 | 1443602.38 | 93797.83 | 252620.36 | | 698098.7 | 938130.45 | 5518 | 5323 NULL | |
| 2010 | 11 reminder | CALLED | | 12 | 8777 | 1664579.16 | 1664366.62 | 1664579.16 | 66031.18 | 227959.11 | 494640.12 | | 847056.82 | 4370 | 4255 NULL | |
| 2010 | 11 reminder | CALLED | | 41 | 131 | 16000.18 | 16000.18 | 16000.18 | 1062.56 | 2486.76 | | 8405.88 | | 69 | 67 NULL | |
| 2010 | 11 reminder | CALLED | | 49 | 6015 | 1973116.3 | 1973116.3 | 1973116.3 | 37256.41 | 105791.53 | 253963.36 | 303831.2 | 375117.17 | 2326 | 2266 NULL | |

1,305,844

1,377,224 344,306 Nov 10 KEDNE

487,395 Last day in Oct. 1,305,844 10/31- 11/03 1,793,240 NGNE

394,513

Division 7-4-ELEC/GAS

Request:

Reference Kaye testimony, page 9, lines 16-19, and page 10, lines 1-8.

- a) Please provide the total incremental increase in accounts receivable and subsequent impact to charge-offs which resulted from extending the winter protection periods in prior years.
- b) Please provide an explanation of the Company's subsequent collection treatment strategies, activities and customer account management processes specifically designed and implemented to mitigate the impact of extending the winter protection periods in prior years.

Response:

- a) Moratorium extensions were granted to protected customers for the winters ending April 2009, 2010, 2011 and 2012. The Company has not conducted a detailed study at the account level to quantify the precise incremental increase in uncollectible amounts attributable to the moratorium because it is not possible to ascertain customer payment ability or motivation from a review of a customer's account. The statements made in the testimony refer to the fact that customer arrearage amounts increase across the board for protected customers when the moratorium is extended because a greater level of gas usage is allowed to occur before shutoff procedures can be initiated. Although the Company could identify the incremental usage attributable to each customer, it cannot reasonably ascertain at what point and to what extent the incremental usage affects the customer's ability to pay the total outstanding balance following the moratorium. However, it is certain that the increase in billed amounts subject to the moratorium inevitably creates a higher amount of uncollectible revenue in the aggregate.
- b) As part of the conversion of Rhode Island gas accounts from the Advantage customer system to the Customer Service System ("CSS") in January 2012, a change was made to the winter collection treatment path for non-protected residential customers. The intent of the change was to accommodate the affidavit process, which requires that, during the winter months, an attempt be made to notify the customer in person that their service could be terminated within 48 hours. Prior to the change, a non-protected customer would become eligible for service termination 13 business days after being issued a Disconnect Notice. Following the change, a non-protected customer now becomes eligible for affidavit issuance 13 business days after being issued a Disconnect Notice. A Field Representative will visit the customer's home during business hours and, if unsuccessful in delivering the affidavit at that time, will make a visit during non-business

Division 7-4-ELEC/GAS, page 2

hours (the evening or weekend). As a result of those visits, CSS will be updated to note that either contact was made with the customer and the affidavit delivered, or that no contact was made with the customer and the affidavit issuance attempt is complete. Two business days after a successful or unsuccessful affidavit issuance attempt, the account becomes eligible for service termination unless the Company is instructed otherwise by the Division of Public Utilities and Carriers. This allows the Company to issue an affidavit and complete a service termination sooner. This change was not put into place for protected customers because this customer class does not become eligible for service termination during the winter months.

The Company also began filing petitions for elderly and handicapped terminations throughout the year, which encouraged both customer contact and payment on large-balance accounts. Prior to the change, the Company only conducted the petition process from April through October, allowing six months out of the year to perform all functions required to obtain approval for termination and to complete termination. Now the Company performs all petition functions, with the exception of field terminations, throughout the year. After the moratorium period (including extension) ends, the Company begins sending accounts that have not established a payment plan to the field for termination.